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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

CHARMAINE CHUA, et al.,

PLAINTIFFS,

vs.

CITY OF LOS ANGELES, et al.,

DEFENDANTS.

Case No.: 16-cv-00237-JAK-GJS

**UPDATED REPORT AND
STIPULATION OF THE PARTIES
REQUESTING ANOTHER
EXTENSION OF THE DATE TO
COMPLETE THE COURT
ORDERED MEDIATION AND TO
REPORT TO COURT**

HON. JOHN A. KRONSTADT

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1 TO THIS HONORABLE COURT AND ALL PARTIES AND THEIR COUNSEL
2 OF RECORD:

3 The parties have attempted to reschedule a second settlement conference with
4 Magistrate Gandhi, after the first settlement conference was conducted on June 30,
5 2017. The parties had agreed to Wednesday, September 13, 2017, but that date
6 became unavailable to the Court. The parties, due to trial schedules of their counsel,
7 then looked for a date in October, 2017. Judge Gandhi was booked for the entire
8 month. The parties successfully secured a further settlement conference for
9 November 27, 2017.

10 On November 20, 2017, lead defense counsel for the *Beers* case underwent
11 major surgery. Lead counsel for the defendants in the *Chua* matter became engaged
12 in an unexpected trial. As a result, defendants feel additional time would be fruitful
13 towards a successful mediation.

14 The parties have contacted Magistrate Gandhi and have selected a tentative
15 new mediation date of **January 24, 2018**.

16 The parties are discussing settlement and narrowing the issues for trial in the
17 meantime. The parties believe a second session with Judge Gandhi may be fruitful.

18 Come now the parties with **STIPULATION OF THE PARTIES**
19 **REQUESTING AN EXTENSION OF THE DATE TO COMPLETE THE**
20 **COURT ORDERED MEDIATION AND TO REPORT TO THE COURT.**

21 On September 19, 2016, this court issued a scheduling order (doc. 35)
22 which inter alia set dates but wrote “tbd: last day to participate in a settlement
23 conference/mediation.”

24 On November 9, 2016, this court discussed the possibilities regarding a
25 settlement conference in conjunction with the settlement completion dates in two
26 other cases, a date of March 17, 2017 was designated as a settlement
27 conference/mediation completion date in this case. Due to illness of former defense
28 counsel, the mediation completion date was continued to the end of June, 2017.

On June 30, 2017, the parties participated in a settlement conference. Several issues arose and the court suggested a second session would be fruitful. In the interim, Judge Ghandi spoke with the parties about the settlement discussions. Judge Ghandi became unavailable on the second scheduled date of September 13, 2017, so the parties requested another date. Judge Gandhi, who knows this case well, is booked until mid-late November. The parties have tentatively selected November 27, 2017 as the new settlement conference date.

Based upon the foregoing, the parties do not believe there can be a productive discussion about case resolution prior to January 2018. The parties agree and stipulate that the court may set the date of February 5, 2018 as a date by which the mediation/settlement conference needs to be completed. The parties agree and stipulate the court may set the date of February 27, 2018 as the date by which the parties file a joint report regarding the status of settlement and agree and stipulate the court may set the date of March 11, 2018 or another date suitable for the court, for a status conference post settlement conference.

ATTESTATION

Pursuant to L.R. 5-4.3.4(a)(2)(i), I hereby attest that Carol A. Sobel, counsel for Plaintiff, concurs in the content of this filing and has authorized this filing.

Dated: November 21, 2017

Michael N. Feuer, City Attorney

/S/ Geoffrey Plowden

Geoffrey Plowden, Deputy City Attorney
Attorneys for Defendants

Dated: November 21, 2017

Kaye, McLane, Bednarski & Litt, LLP
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/s/ Carol A. Sobel

By: CAROL A. SOBEL
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